



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

August 19, 2025

Via ECF

Honorable Jennifer H. Rearden
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *The New York Times Co. et al. v. U.S. Immigration and Customs Enforcement*,
25 Civ. 4356 (JHR)

Dear Judge Rearden:

This Office represents U.S. Immigration and Customs Enforcement (“ICE”), the defendant in this action pursuant to the Freedom of Information Act (“FOIA”) brought by plaintiffs The New York Times Company, Albert Sun, and Allison McCann (“Plaintiffs”) regarding three separate requests that Plaintiffs submitted to ICE on March 17, 2025, and one additional request that Plaintiffs submitted to ICE on May 15, 2025.

I write respectfully on behalf of all parties pursuant to the Court’s order dated June 18, 2025, Dkt. No. 11. The parties previously proposed advising the Court in this joint status report “whether they have been able to reach agreement on a schedule for ICE’s processing of records responsive to Plaintiffs’ FOIA requests in this action.” *See id.*

However, at this time the parties believe that it will not be necessary to set a processing schedule for the requests at issue. ICE issued a response to Plaintiffs’ third FOIA request on July 18, 2025. ICE issued a response to the first, second, and fourth FOIA requests on August 19, 2025. After Plaintiffs review those responses, the parties will confer regarding whether any further proceedings are necessary in this action.

Accordingly, the parties respectfully propose to file a further joint status report by **September 19, 2025**, to advise the Court whether they expect further proceedings and to propose a schedule, if necessary.

I have conferred counsel for Plaintiffs, who join in this proposal. Thank you for your consideration of this matter.

Respectfully submitted,

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United States Attorney

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cc: Counsel of record (via ECF)